

EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

JOHNNY M. HUNT,)
Plaintiff,)
vs.) Case No. 3:23-cv-00243
SOUTHERN BAPTIST CONVENTION;) Judge Richardson
GUIDEPOST SOLUTIONS LLC; and) Magistrate Judge Frenzley
EXECUTIVE COMMITTEE OF THE) Jury Demand
SOUTHERN BAPTIST CONVENTION,)
Defendants.)

PLAINTIFF'S RULE 26(a)(1) INITIAL DISCLOSURES

Pursuant to Federal Rule of Civil Procedure 26(a)(1), Plaintiff Johnny M. Hunt ("Plaintiff") makes the following Initial Disclosures.

Disclosures Pursuant to Fed. R. Civ. P. 26(a)(1)(A)(i). The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment:

1. The following individuals are associated with Plaintiff and may be contacted c/o the undersigned at this time. They have information about the allegations stated in the Complaint, including Plaintiff's damages.
 - a. **Johnny Hunt.**
 - b. **Janet Hunt**, Plaintiff's spouse. Plaintiff does not waive the spousal privilege or any other privilege or protection.

2. **Complainant.**¹ Complainant has knowledge regarding her allegations against Plaintiff in the Report² and on aspects of Guidepost's investigation into the allegations.
3. **Complainant's Husband.** Complainant's Husband has information regarding the Complainant's allegations against Plaintiff in the Report and on aspects of Guidepost's investigation into the allegations.
4. **Roy Blankenship.** Blankenship has information regarding Complainant's allegations against Plaintiff in the Report; on counseling sessions and meetings with Plaintiff, Complainant, and Complainant's Husband; and on aspects of Guidepost's investigation of Complainant's allegations against Plaintiff.
5. **Witness 1** identified in the Report. Witness 1 has information on what Complainant's Husband told him regarding Complainant's allegations against Plaintiff.
6. **Witness 2** identified in the Report. Witness 2 has information on what Complainant's Husband told him regarding Complainant's allegations against Plaintiff.
7. **Witness 3** identified in the Report. Witness 3 has information on what Complainant's Husband told him regarding Complainant's allegations against Plaintiff.
8. Guidepost Investigators who investigated Complainant's allegations against Plaintiff and currently unknown individuals associated or formerly associated with Guidepost involved in drafting the Report.

¹ "Complainant" refers to the woman mentioned in the Report who made allegations against Plaintiff.

² "Report" refers to the "Report of the Independent Investigation, The Southern Baptist Convention Executive Committee's Response to Sexual Abuse Allegations and an Audit of the Procedures and Actions of the Credentials Committee."

9. The following individuals are or were associated with Defendants Southern Baptist Convention and Executive Committee of the Southern Baptist Convention. They may have discoverable information on a wide range of topics, including the details regarding the engagement of Guidepost and the scope of engagement; the investigation of Complainant's allegations against Plaintiff; the process for reviewing, editing, and publishing the Report; and the communications relating to Plaintiff and the Report.

- a. Bart Barber.
- b. Individuals responsible for reviewing the content of the draft Report.
- c. Currently unknown individuals associated or formerly associated with the SBC and/or the Executive Committee.

10. Currently unknown third parties may have discoverable information relevant to this case, on any of the topics listed above.

11. Expert witnesses, who will be disclosed, along with their expert reports, in accordance with the Court's Scheduling Order.

12. Individuals listed on Defendants' initial disclosures, or any party's witness list, or identified in any document produced in discovery or filed with the Court in this case.

13. Records custodians.

14. Any other individuals identified during the course of discovery.

Disclosures Pursuant to Fed. R. Civ. P. 26(a)(1)(A)(ii). A copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.

Upon information and belief, the following is a description by category and location of all documents, electronically stored information, and tangible things in Plaintiff's possession, custody, or control that Plaintiff may use to support his claims.

1. Documents relating to the Complainant's Husband.
2. Documents relating to Plaintiff's book contracts.
3. The Report.
4. Tweets by Bart Barber and others associated with the SBC and/or the Executive Committee.
5. Communications from the SBC and/or the Executive Committee to churches where Plaintiff was scheduled to speak.
6. Documents relating to the SBC's and/or the Executive Committee's structure.
7. Media coverage of the Report and Plaintiff.
8. Documents sufficient to show Plaintiff's damages.
9. Any document filed with the Court in this case.
10. Any document produced during discovery in this case, documents listed in Defendants' initial disclosures, discovery responses, and deposition transcripts from this case.
11. Any document on any party's exhibit list.
12. Expert reports.
13. Deposition transcripts.
14. Records custodian declarations.
15. Business records authenticated by a declarant.
16. Rule 1006 summaries.
17. Plaintiff reserves the right to use, and therefore incorporates herein by reference, any of the documents produced or identified by Defendants in their initial disclosures, written discovery, document productions, or deposition testimony.

Disclosures Pursuant to Fed. R. Civ. P. 26(a)(1)(A)(iii). A computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.

Plaintiff's damages require expert analysis to ascertain. Plaintiff will disclose expert(s) and related report(s) in accordance with the Court's Case Management Order. Some of Plaintiff's damages may be calculated based upon Defendants' financial records or other records, which must be produced by Defendants at the appropriate time.

Disclosures Pursuant to Fed. R. Civ. P. 26(a)(1)(A)(iv). For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

Not applicable to Plaintiff.

Dated: June 1, 2023

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served on June 1, 2023, on the following counsel via email only:

/s/ Patrick J. Sanders
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